

----- Message from "Vershaw, James" <jim.vershaw@irco.com> on Wed, 6 Apr 2011 19:34:35 +0000 -----

To: "mostefficient@energystar.gov" <mostefficient@energystar.gov>

Subject Proposed Recognition Criteria for Top Tier--Ingersoll Rand

: Comments

Ms. Bailey:

Ingersoll Rand provided the following comments on the initial proposal for Energy Star Top Tier on October 29, 2010

1. Be based on performance, not a specific technology
2. Selection should be at a level that top tier products will exist across the capacity range of residential products, not just smaller capacities
3. The number of qualifying models should be large enough that the industry can get behind and promote the program. That requires that the program not differentially benefit one or two manufactures in an industry
4. Take into consideration the current market share of various performance levels
5. Take into consideration how close the market-leading products are to the absolute physical limits and the degree to which closing the gap is really significant.
6. For HVAC, Top Tier should include installer certification that the product installation has been performed in accordance with ACCA Quality Installation [QI] procedures.

It is disappointing that only the first recommendation was incorporated into the latest proposal. The split central air conditioner levels result in no systems currently available above 2 tons that can be matched with a furnace and coil. Only air handler matches go above 2 tons and then only to 3 tons. For split air source heat pumps the levels are such that there are no systems above 3 tons. We would not designate 3.5 and 4 ton air conditioners as "extra-large".

Looking at furnaces, there are only 2 capacities in upflow and 1 in downflow that meet the criteria, and those cannot be matched with the top tier split air conditioners to form a complete system. If the target had been set 97.5%, a full line of units would have been available.

In all cases, the definition of communicating controls is vague and offers no increase in energy efficiency.

The result of this will be frustration for the many homeowners that will not be able to purchase a top tier system; little incentive to manufacturers to advertise top tier systems; and the possibility of having improperly sized equipment since many typical capacities are not available.

Ingersoll Rand recommends that you reconsider these levels and make appropriate adjustments.

Thank you.

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